

New Hampshire Department of Transportation  
Bureau of Highway Maintenance

Corrective and Preventative Action Plan & Root Cause Analysis Form  
EIP-13-Form 13b

EMS Nonconformance Finding Number: \_\_\_\_\_

**PART A** (to be completed by Audit Team or Person Discovering the Nonconformance)

Bureau/District \_\_\_\_\_ Date of Finding: \_\_\_\_\_

Environmental Impact: \_\_\_\_\_

Auditor(s) / Discoverer: \_\_\_\_\_

Priority: \_\_\_\_\_ Related EIP or Work Instruction: \_\_\_\_\_

Corrective and Preventative Action Plan Due Date: \_\_\_\_\_

<b>Nonconformance Description:</b>

**PART B** (to be completed by Corrective Action Team)

<b>Root Cause(s): see Contributing Cause Categories attached List the letter and number of each identified contributing cause</b>

<b>Description of Actions Taken and Contributing Cause:</b>



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**Contributing Cause Categories  
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- A: Equipment Problems –
  - 1. Design or installation
  - 2. Equipment maintenance
  - 3. Ordinary wear and tear
  - 4. Catastrophic failure
  - 5. Site and/or equipment inspections not conducted
  - 6. Exceptions noted in inspections were not followed up
  - 7. Other (specify in Root Cause Section above)
- B: Process Upset or Failure as a result of –
  - 1. Over or under pressure
  - 2. Over or under temperature
  - 3. Runaway reaction
  - 4. Raw material problem
  - 5. Other (specify in Root Cause Section above)
- C: Procedures and Operational Controls –
  - 1. Pre job briefing not conducted or inadequate
  - 2. Operating procedure not followed
  - 3. Operating procedure or work instruction unclear, inadequate or out of date
  - 4. Other operational controls unavailable, inadequate or out of date
  - 5. No written operating procedures available
  - 6. Recordkeeping procedures unavailable or inadequate
  - 7. Roles and responsibilities unclear
  - 8. Reporting or notification procedures unclear, unavailable or inadequate
  - 9. Other (specify in Root Cause Section above)
- D: Communications (difficulties between) –
  - 1. Employees
  - 2. Employee and management
  - 3. Facility and regulatory agency
  - 4. Other (specify in Root Cause Section above)
- E: External Circumstances –
  - 1. An act outside the control of the individuals performing the work
  - 2. External phenomenon (e.g., weather, theft, fire)
  - 3. Contracted services
  - 4. Other (specify in Root Cause Section above)
- F: Human Error –
  - 1. Individual responsibility or professional judgment
  - 2. Fatigue, lack of alertness, distraction
  - 3. Inexperience, lack of knowledge, lack of technical expertise
  - 4. Other (specify in Nonconformance Description)

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- G: Training –
1. Employee(s) not trained
  2. Training materials unclear, inadequate or out of date
  3. Training not provided
  4. Training requirements unclear
  5. Other (specify in Nonconformance Description)
- H: Emergency Preparedness –
1. Emergency plan unavailable
  2. Emergency plan inadequate or out of date
  3. Emergency plan not fully implemented
  4. Roles and responsibilities unclear
- I: Policies/Work Instructions –
1. Policy unavailable
  2. Policy unclear or inadequate
  3. Policy not followed
  4. Environmental objectives and targets unclear
  5. Work Instruction unavailable
  6. Work Instruction unclear or inadequate
  7. Work Instruction not followed
  8. Other (specify in Root Cause Section above)
- J: Management –
1. Management structure undefined, unclear or inadequate
  2. Accountabilities, roles and responsibilities unclear
  3. Management support or guidance not provided or unclear
  4. Staffing resources – insufficient staffing or inappropriate level of expertise
  5. Environmental aspects and impacts of activities and operations not identified
  6. Control and oversight of purchased materials, equipment and services not provided or inadequate
  7. Environmental planning or budgeting not completed
  8. Other (specify in Root Cause Section above)
- K: Compliance Monitoring –
1. Audit program inadequate
  2. Audit follow up procedures unavailable or inadequate
  3. Routine site and equipment compliance checks not conducted
  4. No system to ensure timely submission of environmental reports to agencies
  5. Insufficient environmental data
  6. Other (specify in Root Cause Section above)
- L: Regulatory and Permits –
1. Conflicting permit conditions
  2. Ambiguous or conflicting regulations
  3. Regulatory change not identified
  4. Regulatory change not communicated throughout the organization
  5. Inconsistent regulatory interpretation within the organization
  6. Facility unaware of applicability of a regulation
  7. Other (specify in Root Cause Section above)